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April 14, 2022

BY ECF

The Honorable Loretta A. Preska
U.S. District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Petersen Energía Inversora S.A.U. v. Argentine Republic and YPF S.A.*,
No. 15 Civ. 2739 (S.D.N.Y.) (LAP) (“Petersen”); *Eton Park Capital Mgmt.*
v. Argentine Republic and YPF S.A., No. 16 Civ. 8569 (S.D.N.Y.) (LAP)
 (“Eton Park”)

Dear Judge Preska:

Pursuant to Local Rule 5.2, Rule 2(H) of the Individual Practices of this Court, and Paragraph 13 of the stipulation and order governing the production and exchange of confidential materials in this action (*Petersen* ECF No. 177; *Eton Park* ECF No. 124) (the “Protective Order”), Defendant YPF S.A. (“YPF”) respectfully moves for an order granting leave to file under seal YPF’s enclosed Memorandum of Law in Support of Defendant YPF S.A.’s Motion for Summary Judgment (the “Memorandum”), YPF S.A.’s Rule 56.1 Statement of Undisputed Material Facts in Support of its Motion for Summary Judgment (the “Rule 56.1 Statement”), and Exhibits 41, 42, 48, 51, and 52 to the Declaration of Mark P. Goodman (the “Exhibits”).

The Exhibits are excerpted portions of deposition transcripts which Plaintiffs and/or third parties have designated Confidential under the Protective Order. YPF seeks leave to file the Exhibits under seal and to redact portions of the publicly-available Memorandum and Rule 56.1 Statement that quote from or describe the produced documents and deposition transcripts in light of Plaintiffs’ and third parties’ designations.

Respectfully submitted,

/s/ Shannon Rose Selden

Mark P. Goodman
Shannon Rose Selden

cc: Counsel of Record (By ECF)

SO ORDERED.

Loretta A. Preska

4/15/2022